

Exhibit 3

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____) Master File No. 06-cv-5853 (SAS)
In re Scottish Re Group Securities Litigation ECF Case
_____) _____

STATE OF WISCONSIN)
) ss.
MILWAUKEE COUNTY)

AFFIDAVIT OF ANYA VERKHOVSKAYA

I, Anya Verkhovskaya, being duly sworn, declare as follows:

1. I am the Senior Vice President of A.B. Data, Ltd. (“A.B. Data”). My principal corporate responsibility is the management of A.B. Data’s Class Action Administration Division in Milwaukee, Wisconsin; West Palm Beach, Florida; and New York, New York. This division of the company provides a full range of domestic and international class action and complex litigation support services. My curriculum vitae is annexed hereto as Exhibit 1.

2. I submit this Affidavit in connection with the action entitled *In re Scottish Re Group Securities Litigation*, Master File No. 06-cv-5853 (SAS), filed in the United States District Court, Southern District of New York (the “Action”). This Affidavit is based upon my personal knowledge and information provided by Lead Counsel, my associates, and employees.

Qualifications of A.B. Data

3. A.B. Data has been appointed as notice, claims, and settlement fund administrator in numerous securities, ERISA, antitrust, insurance, consumer, civil rights, and other types of class action cases. I am familiar with and have been directly responsible for administering several hundred complex class action settlements, involving all aspects of direct and media notice programs; claims administration; and settlement fund distributions totaling more than \$2 billion.

4. A.B. Data's headquarters are located in Milwaukee, Wisconsin, where the company has three separate facilities. In addition, A.B. Data has satellite offices in New York, New York; West Palm Beach, Florida; Washington, D.C.; and Tel Aviv, Israel. A brochure about the company is annexed hereto as Exhibit 2.

5. A.B. Data has over 450 employees in its class action administration, consulting, data, print, and mail processing businesses. For purposes of handling the administration of several large cases, A.B. Data added over 900 additional notice and claims processing staff members.

6. A.B. Data designed, analyzed and implemented notice, document management systems and/or claims administration and processing in *In re Holocaust Victim Assets Litigation*, Case No. CV-96-4849, in the United States Eastern District of New York, also referred to as Holocaust Victims Assistance Program (HVAP). As a court appointed notice administrator, A.B. Data played a key role in a worldwide Phase I Notice that resulted in collection of more than 500,000 initial questionnaires. In Phase III, A.B. Data delivered notice to over 10,000 Jewish communities in 109 countries, and administered international help and call centers. In Phase I and Phase III, A.B. Data's staff personally assisted more than 100,000 potential claimants with completion of the Initial Questionnaires and claim forms. A.B. Data was in charge of the claims management process and the submission of all claims.

7. A.B. Data has also administered millions of claims in securities class actions, including analysis, classification, scanning and processing documentation to a searchable database. In *In re Symbol Technologies, Inc. Securities Litigation*, Case No. 02-CV-1383 (LDW) in the United States Eastern District of New York, A.B. Data successfully notified more than 100,000 potential class members. In response to the notice, A.B. Data received, scanned and processed more than 25,000 claims (containing over 500,000 documents) in less than three months.

8. A.B. Data has performed similar types of work in the following securities cases: *In re RenaissanceRe Holdings Ltd. Securities Litigation*, Master File No. 1:05-cv-06764-WHP, United States District Court for the Southern District of New York; *In re BISYS Securities Litigation*, No. 04-CV-3840, United States District Court for the Southern District of New York; *In re SFBC International, Inc., Securities & Derivative Litigation*, No. 2:06-cv-000165-SRC, United States District Court for the District of New Jersey; *In re ICG Communications, Inc. Securities Litigation*, Civil Action No. 00-cv-1864-REB-BNB, United States District Court for the District of Colorado; *In re: King Pharmaceuticals, Inc. Securities Litigation*, No. 2:03-CV-77, United States District court Eastern District of Tennessee, Greenville Division; *In re Kitty Hawk, Inc. Securities Litigation*, Civil Action No. 3-00 CV 0828-P, United States District Court for the Northern District of Texas, Dallas Division; *In re Martek Biosciences Corp. Securities Litigation*, Civil Action No. MJG 05-1224, United States District Court for the District of Maryland, Northern Division; *In re: MK Resources Company Shareholders Litigation*, Consol. C.A. No. 1692-VCS, Court of Chancery of the State of Delaware, New Castle County; *In re Motive, Inc. Securities Litigation*, Civil Action No. A-05-CV-923-LY, United States District Court for the Western District of Texas; *In re OSI Pharmaceuticals, Inc. Securities Litigation*, Master File No. 2:04-CV-05505-JS-WDW, United States District Court Eastern District of New York; *Special Situations Fund III, L.P. et al. v. Quovadx, Inc. et al.*, Civil Action No. 1:04-cv-01006-RPM, United States District Court for the District of Colorado; *In re Visionamerica, Inc. Securities Litigation*, Master File No. 3-00-0279, United States District Court Middle District of Tennessee Nashville Division; *In Re Andrx Corporation, Inc., Taztia XT Securities Litigation*, Case No. 02-60410-CIV-UNGARO-BENAGES, United States District Court Southern District of Florida; *In Re Supervalu, Inc. Securities Litigation*, Civil Action No. 02-CV-1738 (JEL/JGL), United States District Court for the

District of Minnesota; *Stockholders v. Rayovac Corporation*, Civil Action No. 02-Cv-0308, United States District Court for the Western District of Wisconsin; *Tyson Foods, Inc. Securities Litigation*, Civil Action No. 01-425-SLR, United States District Court for the District of Delaware; *In Re Pacific Gateway, Inc., Securities Litigation*, Master File No. C-00-1211-Ph, United States District Court for the Northern District of California; *In Re Nx Networks Securities Litigation, (Rees Plaintiffs)*, Case No. 00-Cv-11850 (JLT) United States District Court of Massachusetts; *In Re Lernout & Hauspie Products, N.V., Securities Litigation*, Case No. 1:00-CV-11589, United States District Court For the District of Massachusetts; *Quaak, et al. v. Dexia, S.A., et al.*, Civil Action No.: 03-CV-11566 (PBS), United States District Court For the District of Massachusetts; *Oscar S. Wyatt, Jr. v. El Paso Corporation*, Civil Action No. H-02-2717, United States Court, Southern District of Texas, Houston Division; *In re International Business Machines Corp Securities Litigation*, Civ. No. 1:05-cv-6279-AKH, United States District Court, Southern District of New York; *In re Visage Technology Inc. Securities Litigation*, Civil Action No. 05-cv-10438-MLW, United States District Court, District of Massachusetts; *In re American Italian Pasta Company Securities Litigation*, Consolidated Civil Action No. 05-CV-0725-W-ODS, United States District Court, Western District of Missouri, Western Division.

9. A.B. Data's Class Action Administration Division is supported by its own Data Services Division, which offers the highest level of security and is able to produce one million personalized mail pieces every 24 hours. A.B. Data's 170,000 square foot Mail Distribution Center has its own on-site United States Postal Service (USPS) sub-station and is one of the nation's largest and most advanced facilities, capable of mailing four million pieces of mail a day. A.B. Data has been entrusted to Magnetic Ink Character Recognition (MICR) print and mail more than 70,000 checks a week totaling nearly a billion dollars annually.

Cost Efficiency Measures

10. A.B. Data continuously updates and enhances its proprietary domestic and international list of banks, brokers and other nominees assuring the most up-to-date addresses and electronic (e-mail) addresses possible to reduce costs.

11. As part of the process of continuously reviewing and improving the effectiveness of its proprietary list, A.B. Data has negotiated prices for the provision of beneficial owner lists from banks, brokers, and other nominees to ensure expense reimbursement requests from these entities are reasonable based on current industry standards.

12. The majority of cases require extensive enhancement and improvement of the data received from the various banks, brokers and other nominees, in order to utilize postal discounts. This provides an average savings of \$0.114 per domestic notice to the class. Such enhancements include:

- a. Running the database against a proprietary database of millions of names and addresses to obtain the most up-to-date addresses;
- b. Standardizing addresses based on the USPS standards and converting them to comply with USPS standard address formats.
- c. Verifying and updating five-digit zip codes, including Zip+4, Carrier Routes, Delivery Point Barcodes, Lines of Travel, Early Warning System, and possible LACS conversions.
- d. Analyzing each address to confirm which category of address it is. Address categories include street, P.O. Box, high-rise, rural, firm, and general delivery.
- e. Isolating addresses that are not valid delivery point addresses according to the USPS and enables to verify that an actual address exists.
- f. CASS certification is used to help you receive the best postal discounts by verifying that your mailing items fall within an accepted range of addresses; and

g. National Change of Address database checks for changes of address filed with the USPS.

28. A.B. Data receives agency rates that provide substantial discounts from newspapers, wire services, and other publications as well. As much as 30% savings over publicly available rates may be garnered by utilizing A.B. Data's services for publication.

Costs Attendant to the Proposed Notice Program in this Action

Publication Notice:

29. For this Action, A.B. Data has secured negotiated quotes for the global edition of *The Wall Street Journal*, which provides for publication in both the national and international editions, and the *Financial Times*, a London financial periodical. The cost of publishing an 1/8 page ad in 7 pt font on a weekday in the global edition of *The Wall Street Journal* will be \$24,982.13, and the cost for publishing in the *Financial Times* will be \$10,080.00.¹

Individual Notice:

30. A.B. Data's extensive legal document printing and mailing background enables design and printing of notices in the most cost efficient manner also allowing for maximum postal discounts.

31. Based on the size of the Notice of: (1) Pendency and Proposed Settlement of Class Action and (2) Hearing on Proposed Settlement ("Notice") and the Proof of Claim form (collectively with the Notice, the "Notice Packet") submitted to the Court for approval, A.B. Data estimates that the cost of printing one Notice and Proof of Claim form will be \$0.98 and the cost for mailing one Notice and Proof of Claim form will be \$0.476 for domestic mail and \$1.415² for international mail.

¹ Pricing will vary depending on the actual length of the publication notice text as approved by the Court.

² This price is a blended average of the four various rates as follows: \$0.96 Canada, \$1.27 Mexico, \$1.74 Europe/China/Japan, and \$1.69 South America/Africa/Middle East/Australia/New Zealand/Pacific Rim/Asia (excluding China and Japan).

32. A.B. Data has received the trading volume for Scottish Re Limited Ordinary Shares, Non-Cumulative Perpetual Preferred Shares and/or Convertible Preferred Shares, and shares of Hybrid Capital Units (collectively the “Securities”) during the Class Period from Lead Plaintiff’s damages expert.

33. A.B. Data analyzed trading volumes for the Securities above and compared them to the trading volumes and number of notices mailed for 24 randomly selected securities cases administered in the past two years in order to determine an estimated range for the quantity of Notice and Proof of Claim forms that will be printed and disseminated for the Action.³ It estimated the range to be a low of 47,500 Notice Packets and a high of 124,280, which averages to 85,890 Notice Packets.

34. Additionally, A.B. Data has estimated that the amount that will be paid to banks, brokers and other nominees for their reasonable expenses in identifying potential Class members will be between \$20,500 - \$43,500 based on expense reimbursement requests received in the same cases reviewed to determine the estimated range of Notice Packets to be sent as discussed in Paragraph 33.⁴

35. Based on the estimated costs in the preceding paragraphs, the table below represents the various prices for the low and upper ranges for the estimated quantity of Notice Packets to be mailed.

	Low Range (47,500 Notices)	Upper Range (124,280 Notices)
Printing Cost	\$46,550.00	\$121,794.40
Postage	\$27,070.25	\$70,827.17
Bank, Broker & Other Nominee Reimbursements	\$20,500.00	\$43,500.00
TOTAL	\$94,120.25	\$236,121.57

The average of the low and upper range estimates noted above for the cost of printing and mailing Notice Packets to potential Class Members and reimbursement to banks, brokers and other nominees is \$165,120.91, based on 85,890 Notice Packets being disseminated.

³ The same set of randomly selected securities cases was used to prepare all estimates herein.

⁴ Since the time that the notice administrations for these historical cases were completed, A.B. Data has negotiated preferred pricing for the records provided by banks, brokers and nominees, so it is anticipated that the actual bank, broker, and other nominee expenses for this Action will be lower.

Cost of Claims Administration

Estimated Number of Claim Forms to be Filed

36. Based on A.B. Data's expertise as a class action claims administrator, and after analyzing the sample cases, A.B. Data determined that the rate of response varied between 1.3% on the low end of the spectrum to 63.9% on the upper end, with an average response rate of 14.7%.⁵

37. The notice process chosen may alter the response rate for claims made and in preparing the estimate below. A.B. Data assumed that direct, mailed notice along with publication notice will be implemented to contact the class, which is most similar to the cases utilized to establish the claims response range in Paragraph 36. In determining the estimate below for the cost of claims administration A.B. Data utilized the lower and upper ranges of the estimated number of Notice Packets to be disseminated and applied the average response rate of 14.7% described in Paragraph

36. Based on these assumptions, A.B. Data estimates that it could receive between 6,983 and 18,270 claim forms, which averages to 12,627 claims.

Estimated Fees and Expenses of Claims Administration

38. In this Action, Lead Counsel negotiated a fee structure with A.B. Data on a per claim basis as opposed to an hourly basis. Additionally, while it is not uncommon for there to be an initial "set up" fee, no such fee is being charged with respect to this administration. Based on A.B. Data's experience, there is substantial benefit to the Class by utilizing this structure in that the fees are fixed based on the response by the Class and the number of claims received, whereas an hourly rate allows for a much higher average per claim cost of processing in instances of lower response rates as well as an overall higher cost of administration.

⁵ The claims response rate relates only to the quantity of claims filed in relation to the number of notices sent. It is not indicative of the damaged shares or recognized losses that will be represented by the claims filed.

39. The negotiated per claim fee is \$10.00 per claim for the first 10,000 claims and \$7.50 per claim thereafter.

40. In addition to the per claim fee, there are several out of pocket costs that will be separately billed. They are the cost of: printing, including but not limited to Notice Packets and checks (if a captive or in-house printer is used, such costs will be competitive with charges available from independent third-party printers); postage, including but not limited to Notice Packets, correspondence with claimants, and checks; reimbursements to brokers and other nominees for researching their records for class member notification purposes; and telephone long-distance charges.⁶

41. A.B. Data is able to minimize these reimbursable out-of-pocket expenses through its cost saving processes and efficiencies of scale. Examples of such measures include:

- a. Handling communication with Claimants regarding deficiencies or rejections in larger mailing groups to take advantage of and average savings on postage of \$0.026 per piece of correspondence through the use of this practice;
- b. Corresponding with larger entities that file claims electronically through secured communications to eliminate postage costs to the Class; and
- c. Reducing telephone long distance expenses while improving the accessibility of the claims administrator by establishing an e-mail address for Claimants to utilize in asking general questions or deficiency correspondence.

42. The table below represents estimated claims administration costs for the lower and upper claim quantity range estimates regarding the services and expenses discussed above.

⁶ Should A.B. Data be required to incur travel expenses in connection with its work in this Action, those expenses will also be billed separately. Furthermore, the cost of specialized affidavits, such as this one, are also billed separately at a discounted hourly rate of \$125/hour (normal rates being \$380/hour for senior management and \$200 for executives).

	Low Range (Based on 6,983 Claims)	Upper Range (Based on 18,270 Claims)
Claims Processing Fee	\$69,830.00	\$112,025.00
Correspondence/Check Printing Cost ⁷	\$2,471.78	\$4,940.64
Correspondence/Check Postage ⁸	\$3,713.04	\$7,090.87
Long Distance Expense ⁹	\$450.00	\$1,850.00
TOTAL	\$76,464.82	\$125,906.51

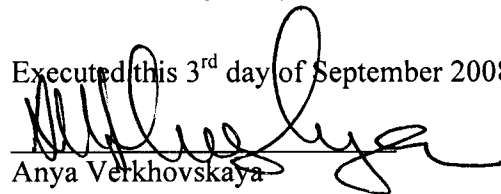
The average of the lower and upper range estimates noted above for processing claims submitted in response to the notice campaign is \$101,185.52, based on 12,627 claims.

Conclusion


43. In sum, it is estimated that total costs will range between \$205,647.20 and \$397,090.21 for notice and the overall administration in this Action, with an average anticipated cost of \$301,368.71.

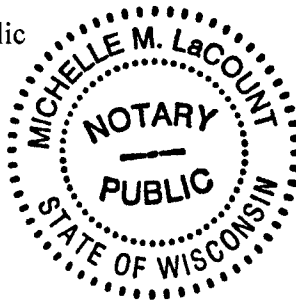
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of September 2008 at Milwaukee, Wisconsin.


Anya Verkhovskaya

SUBSCRIBED and SWORN before me on the 3rd day of September 2008.


Michelle M. La Count, Notary Public
My commission is permanent.



⁷ This estimate reflects 48.5% of estimated claims receiving a check, 3,386 for the lower estimate and 6,768 for the upper estimate, at the current cost of printing, \$0.73 per check.

⁸ This estimate was established based on mailings consisting of 90% domestic postage at \$0.394 and 10% averaged foreign postage at \$0.83. A.B. Data estimates 73% of the claims will receive a deficiency and/or rejection letter and that 48.5% of the claims will receive a check, yielding 8,485 items requiring postage for the low range and 16,204 for the upper range.

⁹ This estimate was established based on similar sized cases' long distance expenses.

Exhibit 1

ANYA VERKHOVSKAYA

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Anya Verkhovskaya is the Senior Vice President of the Class Action Administration Division of A.B. Data, Ltd. In Milwaukee, WI. The A.B. Data Group, founded in 1980, is an international firm that offers a full range of class action and complex litigation support services, with offices in Milwaukee, Wisconsin, New York, New York, Washington D.C., and Tel Aviv. A.B. Data is the fastest growing company in this sector with more than \$2,500,000,000 of settlements currently in various stages of management.

Anya Verkhovskaya has extensive experience in administering class action and settlement administration notice to various groups in the United States and abroad. Anya Verkhovskaya has also provided expert reports and testimony concerning notice adequacy, class certification and settlement issues in connection with a variety of class actions.

Ms. Verkhovskaya has provided notice and/or settlement administration or pre-settlement services in numerous consumer and securities class actions, including:

- *THOMAS MULHERN, individually and on behalf of a class of all persons and entities similarly situated v. JOHN G. MACLEOD d/b/a ABC MORTGAGE COMPANY*, Civil Action No. 2005-01619, Commonwealth of Massachusetts
- *WILLIAM R. MARTIN, et al. v. AAIPHARMA, INC., et al.*, Case No. 7:04-CV-27-D, United States District, Eastern District of North Carolina
- *In re AFFILIATED COMPUTER SYSTEMS ERISA LITIGATION*, Master File No. 3:06-CV-1592-M, United States District Court, Northern District Of Texas, Dallas Division
- *In re AIRGATE PCS, INC. SECURITIES LITIGATION*, Civil Action No. 1:02-CV-1291-JOF, United States District Court, Northern District of Georgia, Atlanta Division
- *LOUIE ALAKAYAK, et al., v. ALL ALASKAN SEAFOODS, INC., et al.*, Case No. 3AN-95-4676 CIV, In the Superior Court for the State of Alaska, Third Judicial District at Anchorage
- *In re AMERICAN ITALIAN PASTA COMPANY SECURITIES LITIGATION*, 05-CV-0725-W-ODS, United States District Court for the Western District of Missouri, Western Division

- *STEPHEN AND ANNE PARKER, et al. v. AMERICAN MEDICAL SECURITY GROUP, INC., et al.*, Civil Action File No. 04-1-1980-42, In The Superior Court of Cobb County, State of Georgia
- *IN RE ANDRX CORPORATION, INC., TAZTIA XT SECURITIES LITIGATION*, Case No. 02-60410-CIV-UNGARO-BENAGES, United States District Court, Southern District of Florida
- *RAUL CERDA AND MARIA G. CERDA v. ASSOCIATES FIRST CAPITAL CORPORATION*, Civil Action No. M-03-146, United States District Court, Southern District of Texas, McAllen Division
- *MICHAEL ALAN HAMILTON v. ATX SERVICES, INC.*, Case No. 08-0030-CV-W-SOW, United States District Court for the Western District of Missouri, Western Division
- *S. PARKER HARDWARE MFG. CORP, et al. v. AT&T CORP.*, Docket No. BER-L-162-06, Superior Court of New Jersey, Bergen County
- *OPEN MRI OF PINELLAS, INC., as assignee of Edward Richards, individually, and on behalf of all those similarly situated v. ATLANTA CASUALTY INSURANCE COMPANY*, Case No. 03-7721, Circuit Court of the 13th Judicial Circuit in and for Hillsborough County, Florida
- *MISTY ARIAS AND LUIS ARIAS, ET AL. v. AWARD HOMES, INC.*, Case No. M54183, Superior Court of California, County of Monterey
- *ESTATE OF MITCHELL HAMPTON, et al. v. BEVERLY ENTERPRISES-ARKANSAS, INC.*, No. CV 2004-95-3, Circuit Court of Bradley County, Arkansas
- *RANDAL S. BRAGG, et al. v. BILL HEARD CHEVROLET, INC. – PLANT CITY*, Case No. 8:02-cv-609-T-30EAJ, In the United States District Court, Middle District of Florida, Tampa Division
- *In re BISYS SECURITIES LITIGATION*, Civil Action No. 04-CV-3840 (LAK), United States District Court, Southern District of New York
- *WILLIAM VON FRIEWALDE, DAVE HARTMAN, MARK COMPAS, AND ROBERT BEVINS v. BOEING AEROSPACE OPERATIONS, INC.*, C.A. No. SA06CA0236-OG, United States District Court for the Western District of Texas, San Antonio Division
- *WENGER, et al. v. BRUNSWICK BUICK PONTIAC GMC, INC., et al. and SODEN, et al. v. EAST BRUNSWICK BUICK PONTIAC GMC, INC., et al.*, Docket Nos. L-2510-03 and L-5617-03, Superior Court of New Jersey, Middlesex County
- *GWEN CARLSON, et al. v. C.H. ROBINSON WORLDWIDE, INC.*, Case No. CV 02-3780 (JNE/JJG), United States District Court for the District of Minnesota
- *In re CARDINAL HEALTH, INC. ERISA LITIGATION*, No. C2-04-643 (ALM), United States District Court, Southern District of Ohio, Eastern Division

- *GERALD AND BIANCA ZELNIK, individually and on behalf of the Class v. CITATION HOMES, INC., a California corporation; and SCS DEVELOPMENT CO., et al.*, Case No. 413861, Superior Court of California, County of San Mateo
- *CLEARVIEW IMAGING, LLC, et al. v. DAIRYLAND INSURANCE COMPANY a/k/a SENTRY INSURANCE A MUTUAL COMPANY, a foreign corporation d/b/n Florida*, Case No. 04-11399, In the Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *CLEARVIEW IMAGING, LLC d/b/a CLEARVIEW OPEN MRI, as assignee of Diana Borges, individually, and on behalf of all those similarly situated v. MERCURY INSURANCE COMPANY OF FLORIDA*, Case No. 03-5170, In the Circuit Court of the Thirteenth Judicial Circuit of the State of Florida, in and for Hillsborough County, Florida, Civil Division
- *CLEARVIEW IMAGING, LLC, as assignee of Raul Trujillo, individually, and on behalf of those similarly situated, et al. v. NATIONWIDE MUTUAL INSURANCE COMPANY, et al.*, Case No. 04-10396, In the Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *CLEARVIEW IMAGING, LLC d/b/a CLEARVIEW OPEN MRI, as assignee of Judith A. Rivero, individually, and on behalf of all those similarly situated v. PROGRESSIVE CONSUMERS INSURANCE COMPANY*, Case No. 03-4174, In the Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *NANCY CANNING AND DANIELLE THOMAS, et al. v. CONCORD EFS, INC.*, Docket No. L-6609-02, Superior Court of New Jersey, Law Division: Camden County
- *In re THE CONSUMERS TRUST*, Chapter 11, Case No. 05-60155 (REG), United States Bankruptcy Court, Southern District of New York
- *In re CP SHIPS LTD. SECURITIES LITIGATION*, Case No. 8:05-MD-1656-T-27 TBM, United States District Court For The Middle District Of Florida
- *ROY VEAL, et al v. CROWN AUTO DEALERSHIPS, INC.*, Case No. 8:04-CV-0323-T-27 MSS, United States District Court, Middle District of Florida, Tampa Division
- *THE LOUISIANA MUNICIPAL POLICE EMPLOYEES' RETIREMENT SYSTEM, et al. v. DELOITTE & TOUCHE LLP*, Civil Action No. 04-621 (LDW), United States District Court, Eastern District of New York
- *HANS A. QUAACK, ATTILIO PO and KARL LEIBINGER, on behalf of themselves and those similarly situated v. DEXIA, S.A. and DEXIA BANK BELGIUM (f/k/a ARTESIA BANKING CORP., SA)*, Case No. 03-CV-11566 (PBS), United States District Court, District of Massachusetts

- *OSCAR S. WYATT, JR., et al. v. EL PASO CORPORATION, et al.*, Civil Action No. H-02-2717, United States District Court, Southern District of Texas, Houston Division
- *In re ELECTRONIC DATA SYSTEMS CORP. "ERISA" LITIGATION*, Case No. 6:03-MD-1512, Lead Case 6:03-CV-126 ("ERISA"), United States District Court, Eastern District of Texas, Tyler Division
- *OSBORN, et al. v. EMC CORPORATION, et al.*, Case No. C 04-00336 JSW, U.S. District Court, Northern District of California, San Francisco Division
- *MOIRA GILLEY, et al. v. ERNIE HAIRE FORD, INC.*, Case No. 02-8101, Circuit Court for the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *RICHARD LONG, On Behalf of Himself and All Others Similarly Situated v. ESCHOLON TELECOM, CLIFFORD D. WILLIAMS, RICHARD A. SMITH, LOUIS L. MASSARO, MARK E. NUNNELLY, MARVIN MOSES, JAMES P. TENBROEK and IAN K. LORING*, Case No. 27-CV-07-6687, Fourth Judicial District of the State of Minnesota, County of Hennepin
- *FAMILY OPEN MRI, INCORPORATED, as assignee of MARTHA PULIDO, individually, and on behalf of all those similarly situated v. DIRECT GENERAL INSURANCE COMPANY*, Case No. 03-4175, Circuit Court for the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, Civil Division
- *CHARLES B. COTTEN, JR. and DEBORAH E. COTTEN, and NARSULLAH A. FAROOQUI, and ZAHRA F. FAROOQUI, individually, and on behalf of all those similarly situated, vs. FERMAN MANAGEMENT SERVICES CORPORATION, FERMAN MOTOR CAR COMPANY, INC. FERMAN CHRYSLER-DODGE-JEEP OF WAUCHULA, INC. d/b/a FERMAN OF WAUCHULA, FERMAN JEEP, INC., FERMAN FORD, INC., and SUNSHINE CHEVROLET-OLDSMOBILE OF TARPON SPRINGS, INC.*, Case No.: 02-08115, Circuit Court for the Thirteenth Judicial Circuit, Hillsborough County, Florida Civil Division
- *THOMAS BURNS and MARK LARSEN, et al. v. FIRST AMERICAN BANK*, No. 04 C 7682, United States District Court for the Northern District of Illinois, Eastern Division
- *SARAH MARTIN AND JEFFREY S. MARTIN v. FOSTER WHEELER ENERGY CORPORATION*, No. 3:06-CV-878, United States District Court, Central District of California
- *FW TRANSPORTATION, INC., et al. v. ASSOCIATES COMMERCIAL CORPORATION*, Case No.C200000084, District Court of Johnson County, Texas, 18th Judicial District
- *In re: ASSICURAZIONI GENERALI S.p.A. HOLOCAUST INSURANCE LITIGATION*, MDL 1374 M21-89 (GBD), United States District Court, Southern District of New York
- *GERMAN FORCED LABOR COMPENSATION PROGRAM (GFLCP)*

As designated by IOM, A.B. Data located more than 43,000 Romani survivors in 17 countries of Central and Eastern Europe who were potentially eligible for humanitarian aid. A.B. Data created a comprehensive database for GFLCP/HVAP, and directly assisted more than 11,000 Romanies in eight Central and Eastern European countries with claim completion.

- *VASUKI PARTHIBAN, et al. v. GMAC MORTGAGE CORPORATION, D/B/A DITECH.COM*, Case No. SACV-05-768-ODW (MLGx), United States District Court, Central District of California, Southern Division
- *SHARON PETTWAY and MARSHA HUBBARD, et al. v. HARMON LAW OFFICES, P.C.*, Case No. 03-10932-RGS, United States District Court, District of Massachusetts
- *HOLOCAUST VICTIM ASSETS LITIGATION (SWISS BANKS) (HVAP)*

As a court appointed notice administrator, A.B. Data played a key role in a worldwide Phase I Notice that resulted in more than 500,000 initial questionnaires. In Phase III, A.B. Data delivered notice to over 10,000 Jewish Communities in 109 countries, and administered international Help and Call Centers in Phase I and Phase III that personally assisted more than 100,000 potential claimants.

A.B. Data created a class-appropriate notice targeting Romanies (Gypsies) in 48 countries, and directed hundreds of staff to communicate orally and directly with Romani communities and individuals. A.B. Data notified more than two million people, and as designated by the International Organization for Migration (IOM), directly assisted more than 22,000 Romanies in 17 countries of Central and Eastern Europe with claim completion.

- *HUDSON UNITED BANK v. WENDY D. CHASE and RODNEY MILLER, et al.*, Docket No. L-235-05, Superior Court of New Jersey, Hunterdon County
- *In re ICG COMMUNICATIONS, INC. SECURITIES LITIGATION*, Civil Action No. 00-cv-1864-REB-BNB (Consolidated with 00-cv-1908-REB-BNB, 00-cv-1910-REB-BNB, 00-cv-1919-REB-BNB, 00-cv-1945-REB-BNB, 00-cv-1954-REB-BNB, 00-cv-1957-REB-BNB, 00-cv-1963-REB-BNB, 00-cv-1996-REB-BNB, 00-cv-2040-REB-BNB, 00-cv-2074-REB-BNB, 00-cv-2149-REB-BNB, 00-cv-2243-REB-BNB, and 00-cv-2316-REB-BNB) United States District Court for the District of Colorado
- *VALUEPOINT PARTNERS, INC., on behalf of itself and all others similarly situated v. ICN PHARMACEUTICALS, INC. et al.*, Case No. SACV 03-989 DOC (Anx), United States District Court, Central District of California
- *THE INTERNATIONAL COMMISSION ON HOLOCAUST ERA INSURANCE CLAIMS (ICHEIC)*

ICHEIC assigned A.B. Data to conduct a domestic (US) and worldwide outreach program resulting in over 72,000 claims. A.B. Data launched and coordinated international Help, Call, and Mail Distribution Centers, provided direct assistance with claim completion, and consulted to ICHEIC in various areas including: multi-lingual data and database

management, postal issues, and historical and geographical matters that directly influenced the eligibility criteria.

- *In re INTERNATIONAL BUSINESS MACHINES CORP. SECURITIES LITIGATION*, 1:05-cv-6279 (AKH), United States District Court, Southern District of New York
- *TERRY P. SILKE, on behalf of himself and all others similarly situated v. IRWIN MORTGAGE CORPORATION*, Cause No. 49D03-0304-PL-000697, Marion Superior Court, Civil Division
- *ANDREW PALIOTTO, et al. v. THE JOHNNY ROCKETS GROUP, INC.*
- *IN RE KING PHARMACEUTICALS, INC.*, Lead Case No. 2:03-CV-77, United States District Court, Eastern District of Tennessee, Greeneville Division
- *TODD HOLLEY, individually and on behalf of all those similarly situated v. KITTY HAWK, INC, M. TOM CHRISTOPHER, RICHARD WADSWORTH AND CONRAD KALITTA*, Case No. 3-00 CV 0828-P, United States District Court for the Northern District of Texas, Dallas Division
- *BARBARA A. MANN AND JOHN W. MANN, individually and as the representatives of a class of similarly situated persons v. LAWYERS TITLE INSURANCE CORPORATION*, Case No. 03-CH-15223, Circuit Court of Cook County, Illinois County Department, Chancery Division
and
THADDEUS M. ROLARK AND ANTOINETTE ROLARK, individually and as the representatives of a class of similarly situated persons v. LAWYERS TITLE INSURANCE CORPORATION, Case No. 03-CH-13789, Circuit Court of Cook County, Illinois County Department, Chancery Division
and
MARTIN ACEVEDO, individually and as the representative of a class of similarly situated persons v. LAWYERS TITLE INSURANCE CORPORATION, Case No. 03-CH-07718, Circuit Court of Cook County, Illinois County Department, Chancery Division
- *STACY DeCARIO, individually, on behalf of other similarly situated, and as a private attorney general on behalf of the general public v. LERNER NEW YORK, INC., a Delaware Corporation and Does 1 through 100 inclusive*, Case no. BC 317954, Los Angeles County Superior Court of the State of California
- *IN RE LERNOUT & HAUSPIE PRODUCTS, N.V., SECURITIES LITIGATION*, Case No. 1:00cv11589, United States District Court for the District of Massachusetts
- *IN RE LERNOUT & HAUSPIE PRODUCTS, N.V., SECURITIES LITIGATION (KPMG)*, Case No. 04-CV-1738, United States District Court for the District of Massachusetts
- *LOUIS COLEMAN, JR, and wife PRISCILLA COLEMAN; SPRUILL THOMPSON, and wife KAREN THOMPSON; JEFFREY COLEMAN and wife MICHELLE COLEMAN vs. LINCOLN*

WOOD PRODUCTS, INC. Case No.: 99-CVS-1362, General Court of Justice, New Hanover County, North Carolina, Superior Court Division

- *FRANK CAPOVILLA, on behalf of himself and all others similarly situated v. LONE STAR TECHNOLOGIES, INC., RHYS J. BEST, FREDERICK B. HEGI, JR., M. JOSEPH MCHUGH, ALFRED M. MICALLEF, JERRY E. RYAN, ROBERT KELLEY, ROBERT L. KEISER, DAVID A. REED and DAN O. DINGES*, Cause No. 07-02979, District Court of Dallas County, Texas, 14th Judicial District
- *In re MARTEK BIOSCIENCES CORPORATION SECURITIES LITIGATION*, Civil Action No. MJG 05-1224, United States District Court, District of Maryland (Northern Division)
- *VALERIE HUGHLEY, et al. v. MARYLAND CASUALTY COMPANY, a foreign corporation*, Case No. 06-21428-CIV-ALTONAGA, United States District Court for the Southern District of Florida, Miami Division
- *EVAN FRAY-WITZER, et al. v. METROPOLITAN ANTIQUES, LLC*, Civil Action No. 02-5827, Commonwealth of Massachusetts, Superior Court Department of the Trial Court, Suffolk Division
- *In re MICROMUSE, INC. SECURITIES LITIGATION GREG SUTTERFIELD, derivatively and on behalf OF MICROMUSE, INC. v. LLOYD CARNEY, et al.*, Defendants and MICROMUSE, INC., Nominal Defendant, Case No. C-04-0136BZ, United States District Court, Northern District of California
- *MN CORN PROCESSORS CLASS ACTION: STEVEN RUPP, DOUGLAS ALBIN, VINCENT BOT, JAMES LARSON AND MICHAEL ZINS, PLAINTIFFS V. L. DANIEL THOMPSON, MICHAEL MOTE, ROGER UNTIEDT, LARRY SCHIAVO, JOSEPH BENNETT, DANIEL STACKEN, STANLEY SITTON, ROGER EVERT, JERRY JACOBY AND JOHN AND MARY DOE, DEFENDANTS*, File No. C5-03-347, State of Minnesota District Court, County of Lyon Fifth Judicial District
- *GIL WISNIAK, on Behalf of Himself and All Others Similarly Situated v. MIRANT AMERICAS GENERATION, LLC, RICHARD J. PERSHING, J. WILLIAM HOLDEN, III, STEPHEN G. GILLIS, S. MARCE FULLER, AND RAYMOND D. HILL*, Civil Action No. 1:03-CV-2049-BBM, In the United States District Court for the Northern District of Georgia, Atlanta Division
- *In re MK RESOURCES COMPANY SHAREHOLDERS LITIGATION*, Consolidated Case No. 1692-VCS, Court of Chancery, New Castle County, State of Delaware
- *In re MOTIVE, INC. SECURITIES LITIGATION*, Civil Action No. A-05-CV-923-LY and *ADAIR v. MOTIVE* (The "Derivative Action"), Case No. A-06-CA-017-LY, United States District Court For The Western District Of Texas
- *ULTRA OPEN MRI CORPORATION, et al. v. NATIONWIDE ASSURANCE COMPANY, et al.*, Case No. 03-010725, Thirteenth Judicial Circuit Court in and for Hillsborough County, Florida, Division H

- *PAUL CURTIS, NORMAN CURTIS & JANET GUSTAFSON, on behalf of themselves and all others similarly situated v. NORTHERN LIFE INSURANCE COMPANY*, No. 01-2-18578-1 SEA, Superior Court of Washington for King County
- *IN RE Nx NETWORKS SECURITIES LITIGATION, (REES PLAINTIFFS)*, Case No. 00-CV-11850 (JLT) United States District Court, District of Massachusetts
- *EDWIN HESS v. ORIOLE HOMES CORP., RICHARD D. LEVY, HARRY A. LEVY, MARK A. LEVY, GEORGE R. RICHARDS AND PAUL R. LEHRER*. Case No. CA 02-13794AA, Circuit Court of the 15th Judicial Circuit, Palm Beach County, Florida
- *ERNEST W. WARREN AND DOLORES G. WARREN and all others similarly situated v. ROLLINS, INC. AND ORKIN EXTERMINATING COMPANY, INC.*
- *In re OSI PHARMACEUTICALS, INC. SECURITIES LITIGATION*, Master File No. 2:04-CV-05505-JS-WDW, United States District Court, Eastern District of New York
- *In re PACIFIC GATEWAY EXCHANGE, INC. SECURITIES LITIGATION*, Master File No. C-00-1211-PH, United States District Court for the Northern District of California
- *JAMES F. GROEN, et al. v. POLYMEDICA CORPORATION, PATRICK T. RYAN, JAMES J. MAHONEY, JR., FRANK W. LOGERFO, MARCIA J. HOOPER, EDWARD A. BURKHARDT, SAMUEL L. SHANAMAN, WALTER R. MAUPAY, JR., ALAN D. SOLOMONT, KRISHNA G. PALEPU, WILLIAM C. VAN FAASEN, MEDCO HEALTH SOLUTIONS, INC., and MACQ CORP.*, C.A. No. 07-3352, Commonwealth of Massachusetts, Superior Court Department, Middlesex County
- *LILLIAN NTHENGE, on behalf of herself and those similarly situated v. PRESSLER AND PRESSLER COUNSELORS AT LAW, a/k/a PRESSLER & PRESSLER; and John Does 1 to 25*, Master File No. C-00-1211-PH, United States District Court for the Northern District of California
- *PREMIER OPEN MRI, LLC, et al. v. PROGRESSIVE AMERICAN INS. CO., et al. and PREMIER OPEN MRI, LLC, et al. v. PROGRESSIVE AUTO PRO INS. CO., et al. and PREMIER OPEN MRI, LLC, et al. v. PROGRESSIVE EXPRESS INS. CO., et al.*, Case No. 04-00021, Circuit Court for the Thirteenth Judicial Circuit in and for Hillsborough County, Florida
- *SPECIAL SITUATIONS FUND III, LP, et al. v. QUOVADIX, INC., et al.*, Case No. 04-cv-01006-RPM, United States District Court for the District of Colorado
- *ELI FRIEDMAN, Individually and on behalf of all Others Similarly Situated v. RAYOVAC CORPORATION*, Civil Action No. 02-CV-0308, United States District Court for the Western District of Wisconsin

- *In re RCN Corporation ERISA Litigation*, Master File No. 04-CV-5068 (FLW), United States District Court, District of New Jersey
- *In re READY-MIXED CONCRETE ANTITRUST LITIGATION*, Case No. 1:05-cv-00979-SEB-VSS, United States District Court For The Southern District Of Indiana, Indianapolis Division
- *In re RELIANT SECURITIES LITIGATION*, Civil Action No. H-02-1810 (Consolidated), United States District Court, Southern District of Texas, Houston Division
- *In re RENAISSANCERE HOLDINGS LTD. SECURITIES LITIGATION*, Master File No. 1:05-cv-06764-WHP, United States District Court, Southern District of New York
- *HILDA PEREZ, on Behalf of Herself and All Others Similarly Situated v. RENT-A-CENTER, INC.*, Docket No. CAM-L-21-03, Superior Court of New Jersey, Law Division: Camden County
- *EVELIA Y. RAGSDALE V. SANSAL USA, INC.*, Case No. 07 CV 1246 WQH(CAB), United States District Court, Southern District of California
- *MANTZOURIS, et al. v. SCARRITT MOTOR GROUP, INC.*, Case No. 8:03-CV-00150T-30-MSS, U.S.D.C., Middle District of Florida, Tampa Division
- *IN RE SEARS, ROEBUCK & COMPANY ERISA LITIGATION*, No. 02 C 8324, United States District Court, Northern District of Illinois
- *In re SFBC INTERNATIONAL, INC. SECURITIES & DERIVATIVE LITIGATION*, Case No. 2:06-cv-000165SRC, United States District Court, District of New Jersey
- *JEFFREY ESTEP, et al. v. SMYTHE VOLVO, INC.*, Docket No. UNN-L-004184-03, Superior Court of New Jersey, Union County – Law Division
- *HOWARD KUBOTA, On Behalf of Himself and All Others Similarly Situated and Derivatively On Behalf of SOURCECORP, INC., v. THOMAS C. WALKER, ED H. BOWMAN, JR., DAVID LOWENSTEIN, JONATHAN B. SHAW, MICHAEL J. BRADLEY, DONALD F. MOOREHEAD, JR., EDWARD M. ROWELL, G. MICHAEL BELLENGHI, BARRY L. EDWARDS, W. BRYAN HILL and APOLLO MANAGEMENT, L.P. and SOURCECORP, INC. (Nominal Defendant)*, Cause No. 06-02446, District Court of Dallas County, Texas, 95th Judicial District
- *JASON and SHARON EVANS, et al. v. STEWART TITLE GUARANTY COMPANY*, Case No. 04-06630-05, Circuit Court of the 17th Circuit, Broward County, Florida
- *TERESA BAUMAN v. SUPERIOR FINANCIAL CORP., C. STANLEY BAILEY, RICK D. GARDNER, C. MARVIN SCOTT, HOWARD B. McMAHON, JOHN M. STEIN, BEN F. SCROGGIN, BRIAN A. GAHR, JOHN E. STEURI, DAVID E. STUBBLEFIELD, ERNST & YOUNG, LLP, AND JOHNNY McCALEB*. Civ. Action No. 4-01-CV-00756 GH, United States District Court, Eastern District of Arkansas Western Division

- *WILLIAM B. COTTRELL v. RICK D. GARDNER, et al.*, Civ. Action No. CV-2002-121(I) Superior Financial Corp. Derivative Action
- *IN RE SUPERVALU, INC. SECURITIES LITIGATION*, Civil Action No. 02-CV-1738 (JEL/JGL), United States District Court for the District of Minnesota
- *In re SUPREMA SPECIALTIES SECURITIES LITIGATION*, Master File No. 02-168 (WHW), United States District Court, District of New Jersey
- *IN RE SYMBOL TECHNOLOGIES, INC., SECURITIES LITIGATION*, Case No. 02-CV-1383 (LDW), United States District Court, Eastern District of New York
- *PATRICIA CROXALL, et al. v. TAMPA HUND, L.P., et al.*, Case No. 03-6201, The Circuit Court for the Thirteenth Judicial Circuit In and For Hillsborough County, Florida Civil Division
- *DON BRIEGER, ROBERT BECKER, ALAN BURSTIN and HARRY SCHULTZ, individually and on behalf of all others similarly situated v. TELLABS, INC., et al. (ERISA)*, Case No. 1:06-CV-1882, United States District Court, Northern District of Illinois, Eastern Division
- *SAMONE W. CLEMONS and DONYALE JORDAN, et al. v. DONNA L. THOMPSON a/k/a LAW OFFICES OF DONNA L. THOMPSON, ESQ., et al.*, Docket No. MON-L-001980-07, Superior Court of New Jersey, Monmouth County – Law Division
- *CEMENT MASONS & PLASTERERS JOINT PENSION TRUST, on behalf of itself and all others similarly situated v. TNS, INC., JOHN J. MCDONNELL, JR. AND HENRY H. GRAHAM, JR.*, Case No. 1:06 CV 363 DMH/BRP, United States District Court, Eastern District of Virginia
- *DAVID MONTALVO, et al. v. TRIPOS, INC., et al.*, Case No. 4:03CV995SNL, United States District Court, Eastern District of Missouri
- *JAMES BRANT HARGRAVE, PATRICE HARGRAVE, BRENDA MAYNARD, and MENTHA W. PRICE, on behalf of the TXU Thrift Plan, and all other persons similarly situated v. TXU CORP., et al. (ERISA)*, Case No. 3:02-CV-2573-K (Consolidated with Case No. 3:03-CV-423-K and Case No. 3:03-CV-0577-K), United States District Court, Northern District of Texas, Dallas Division
- *MARVIN OVERBY, et al. v. TYCO INTERNATIONAL LTD., et al. (ERISA)*, Case No. 02-CV-1357-B, United States District Court, District of New Hampshire
- *TYSON FOODS, INC. SECURITIES LITIGATION*, Civil Action No. 01-425-SLR, United States District Court for the District of Delaware
- *UNITED CONSUMER FINANCIAL SERVICES COMPANY v. WILLIAM CARBO, et al. v. A&M MERCHANDISING, INC., et al.*, Case No. L-3438-02, Superior Court of New Jersey Law Division: Hudson County

- *VALLEY NATIONAL BANK v. CAHN*, Docket No. L-0504-04, Superior Court of New Jersey, Law Division of Mercer County
- *IN RE VASO ACTIVE PHARMACEUTICALS SECURITIES LITIGATION*, Master Docket No. 04-10708 (RCL), United States District Court, District of Massachusetts
- *IN RE VASO ACTIVE PHARMACEUTICALS DERIVATIVE LITIGATION*, Master Docket No. 04-10792 (RCL) (Consolidated Derivative Action)
- *SOUTHEAST TEXAS MEDICAL ASSOCIATES, LLP v. VERISIGN, INC.*, Case No. 1-05-CV-035550, Superior Court of the State of California, County of Santa Clara
- *In re VIISAGE TECHNOLOGY, INC. SECURITIES LITIGATION*, Civil Action No. 05-cv-10438-MLW, United States District Court, District of Massachusetts
- *IN RE VISIONAMERICA, INC. SECURITIES LITIGATION*, Master File No. 3-00-0279, United States District Court, Middle District of Tennessee, Nashville Division
- *IN RE WARNER CHILCOTT LIMITED SECURITIES LITIGATION*, Case No. 06-CV-11515-WHP, United States District Court, Southern District of New York
- *ANDREA KAY, et al. v. WELLS FARGO & COMPANY, WELLS FARGO BANK, N.A., NORTHSTAR MORTGAGE GUARANTY REINSURANCE COMPANY*, Case No. 07-01351 WHA, United States District Court for the Northern District of California
- *IN RE ZOMAX*, Civil Action No. 04-1155 (DWF/SRN), United States District Court, District of Minnesota

Ms. Verkhovskaya's diverse background and skills bring strength to any project.

- Worked for many years with Steven Spielberg as an expert on community outreach in Europe and the countries of the former Soviet Union.
 - Created an outreach community network in more than 20 Eastern European and former Soviet Union countries, which resulted in videotaping of more than 9,000 interviews with Jewish, Romani and other Holocaust survivors and witnesses. Oversaw a multimillion-dollar budget, 14 field offices and 1,200 staff members. Devised and implemented production, research, community outreach/relations, publicity, legal, translation, shipping, accounting, fundraising, data entry, database management, and quality control.
- Produced several documentary films, winning numerous awards.
- Worked as a pediatric registered nurse at the New York University Medical Center in New York City.
- Served on Advisory Committee for New Émigrés in New York City.

- Founder and Member of the Board of Director of the Archive: Institute of Russian Jewish American Diaspora, New York City. Sir Martin Gilbert, Honorary Chair. A non-profit organization founded to preserve the history and collective memory of the Jewish immigrant community from the former Soviet Union.

Exhibit 2

PRE-SETTLEMENT SERVICES

- Create interactive document management system for court presentations and settlement negotiations
 - Analyze volumes of documents
 - Provide expert testimony on document and process manageability
 - Consult on the proposed plan of allocation
 - Conduct preliminary notice
- NOTICE ADMINISTRATION**
- Locate potential class members
 - Design, print and disseminate direct notices
 - Track undeliverable mail and re-print notices on demand
 - Utilize proprietary list of nominees
 - Create and implement synergistic media program
 - Establish interactive telecommunications services
 - Design, support and host web-notification sites
 - Coordinate legal translation of notice and related documents

CLAIMS PROCESSING

- Design case-customized claims
- Convert documentation into searchable database
- Verify claims substantiations
- Resolve claims deficiencies
- Manage claims-related correspondence
- Ensure bulletproof claims review and resolution
- Calculate and report award amount
- Provide comprehensive reporting
- Prepare affidavits and recommendations for distribution

SETTLEMENT FUND ADMINISTRATION

- Provide escrow services
- Create fund investment strategy
- Print and mail checks and coupons
- Electronic transfer of settlement proceeds
- Distribute stock and other financial instruments
- Perform daily account reconciliation
- Ensure highest level of security and confidentiality
- Conduct ongoing quality assurance and control
- Provide all-inclusive tax and accounting services

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PRE-SETTLEMENT SERVICES

At A.B. Data, we help you prepare a stronger case. Our technology and acumen empower you to manage a maze of documents during investigation and discovery. A.B. Data's honed skills of logic enable us to walk into a warehouse with millions of disorganized documents and walk out with a fully interactive media package for court presentations and settlement negotiations.

A.B. Data's services include expert testimony on document and process manageability and deliberative opinions on proposed plans of allocation.

A partnership with A.B. Data will give you confidence that your case management is well planned and begins on solid footing.

NOTICE ADMINISTRATION

A.B. Data's notice programs are known worldwide for their innovation, efficiency, affordability and full compliance with Federal Rule of Civil Procedure 23(c)(2)(B).

A.B. Data provides the knowledge and attention to detail necessary to ensure that notice documents are flawless and our affidavits bulletproof.

A.B. Data has notified millions of class members in 109 countries who spoke more than 80 languages.

Domestically, as part of our multifaceted approach to data management, we are licensees of numerous postal products, including National Change of Address (NCOA) Link, which captures millions of moves across the United States.

Our talent drives our technology. And our dedication and expertise drive us to meet all deadlines without compromising quality.

A.B. Data has notified millions of class members in 109 countries who spoke more than 80 languages.

CLAIMS PROCESSING

A.B. Data's claims administration engine combines accuracy and speed with our human touch.

We raise the bar on claims processing through a unique in-house team, which includes several former class action attorneys, that analyze the intricacies of each claim.

Most importantly, A.B. Data's technological prowess is guided by our philosophy of respect and professionalism.

We remain sensitive to the individual needs of clients and claimants and strive to ensure that each call we receive is handled by real people in real time.

A.B. Data. Raising the bar on claims processing.

RETAINING OUR SERVICES

For more information, please contact Victoria Waciura, Esq., Vice President Business Development, at (646) 290-9137, Victoria.Waciura@abdata.com; or Anya Verkhovskaya, Senior Vice President, at (414) 963-6441, anya@abdata.com.

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